


**EXHIBIT 1**

4. Attorney fees were reasonably and necessarily incurred by Defendants in connection with a Motion to Compel [Doc. 102] filed on March 8, 2022, in this matter. Plaintiff did not respond to the Motion.
5. The Court granted the majority of the requests made in the Motion to Compel, and Ordered Defendants file a supported Fee Petition, with a reduction for the time spent on the portion of the motion regarding fact witness depositions.
6. Reviewing the discovery requests and Plaintiff's responses, the relevant law on these issues, and drafting the Motion to Compel [Doc. 102], Defense counsel expended a total of 7.5 associate hours at a rate of \$95.00 and 1.0 supervising attorney hours at a rate of \$165.00. Thus, the total incurred Attorney's fees for the Motion were \$877.50.
7. The time spent on the section regarding fact witness depositions, which was not granted by the Court, amounted to approximately twenty-five percent of the time, resulting in a 25% reduction and a reduced total of \$658.12.
8. The hourly fees charged by Garcia Law Group, LLC in connection with this matter are similar to fees charged by similarly experienced counsel practicing in this field.

**FURTHER AFFIANT SAYETH NOT**

  
 \_\_\_\_\_  
 RODNEY GABALDON, ESQ.

STATE OF NEW MEXICO )  
 ) ss.  
COUNTY OF BERNALILLO )

Sworn and subscribed to before me by Rodney Gabaldon, Esq. on this 22 day of April, 2022.

~~Notary Public~~

My Commission Expires:

12-13-2025-

STATE OF NEW MEXICO  
NOTARY PUBLIC  
Shelly M. Johnson  
Commission No. 1136204  
December 13, 2025